

**MILMAN LABUDA LAW GROUP PLLC**

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September 27, 2023

**VIA ECF**

United States District Court  
Eastern District of New York  
Attn: Hon. Vera M. Scanlon, U.S.M.J.  
225 Cadman Plaza East  
Courtroom 13A South  
Brooklyn, NY 11201-1804

**Re: Sanchez v. EZ Parking Corp., et al.**  
**Case No.: 1:23-cv-4052 (AMD) (VMS)**

Dear Judge Scanlon:

This office represents the Defendant EK Premier Services LLC (“EK”) in the above-referenced case. See ECF Docket Entry [12](#). Defendant EK writes, with Plaintiff’s consent, to respectfully request a forty-five (45) day extension of time from September 23, 2023 to respond to the complaint in this case. Pursuant to ¶ II(b) of this Court’s Individual Practice Rules, Defendant EK respectfully submits that: (i) the original date to respond to the complaint was September 11, 2023, but Defendant EK only recently received notice of this lawsuit; (ii) there have been no previous requests for an extension of time; (iii) the Plaintiff consents to the requested extension of time; (iv) the reason for the requested extension is because your undersigned needs additional time to investigate the allegations and explore a pre-litigation resolution; (v) the requested extension would move the deadline to Tuesday, November 7, 2023; and (vi) Defendant EK is not aware of any other scheduled dates the requested extension would affect.

Accordingly, Defendant EK respectfully submits that there is good cause for the requested extension of time. See Fed. R. Civ. P. 6(b)(1)(A). Defendant EK thanks this Court for its time, attention, and anticipated courtesies in this case.

Dated: Lake Success, New York  
September 27, 2023

Respectfully submitted,  
**MILMAN LABUDA LAW GROUP PLLC**  
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**VIA ECF**

United States District Court  
Eastern District of New York  
Attn: Hon. Ann M. Donnelly, U.S.D.J.  
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